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FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF SECRETARY

Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554

In the Matter of)
Amendment of Part 90)
of the Commission's Rules) PR Docket No. 93-144
to Facilitate Future Development) RM-8117, RM-8030
of SMR Systems) RM-8029
in the 800 MHz Frequency Band)
and)
Implementation of Section 309(j))
of the Communications Act -) PP Docket No. 93-253
Competitive Bidding)
800 MHz SMR)

To: The Commission

**COMMENTS OF
CENTENNIAL TELECOMMUNICATIONS, INC.**

Centennial Telecommunications, Inc. ("Centennial"), pursuant to Section 1.415(a) of the Federal Communications Commission's ("FCC" or "Commission") rules and regulations, hereby respectfully submits its comments to the Further Notice of Proposed Rule Making ("Further Notice") in the above-styled proceeding.¹

Centennial, whose sister company is a founding principal of OneComm Corporation, is currently implementing wide-area digital Specialized Mobile Radio ("SMR") systems in the Midwest, and is participating in several other wide-area digital SMR networks being developed. Accordingly, because of its involvement in wide-area SMR networks, Centennial takes this opportunity to comment on

¹Further Notice of Proposed Rules Making (FCC 94-271), PR Docket No. 93-144 and PP Docket No. 93-253, 59 F.R. 60112 (November 22, 1994). The Comment Period was extended by Order (DA 94-1326) adopted November 28, 1994 until January 5, 1995 and the Reply Comment period was extended until January 20, 1995.

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certain proposals set forth in the Further Notice which directly affect wide-area digital SMR networks.

In the Further Notice, the Commission seeks comments on a myriad of issues pertaining to the licensing, construction and operation of SMR stations. Specifically, the Commission proposes to allocate 10 MHz of 800 MHz spectrum currently allocated to "local" SMR operations ("Contiguous 800 MHz SMR Channels")² for the licensing of wide-area SMR networks and revisiting the licensing of "local" SMR stations on the remaining 4 MHz of 800 MHz spectrum currently allocated for SMR operations ("Non-Contiguous 800 MHz SMR Channels").³ Centennial, however, focuses its comments on the issue of relocation of incumbent licensees should the Commission adopt its reallocation proposal.⁴

Centennial supports the Commission's proposal that any relocation of an incumbent be voluntary rather than a mandatory relocation requirement as may be propounded by other parties to this proceeding. Many incumbent licensees have invested a great amount of money and energy in developing viable businesses or business plans for the use of licensed channels on the Contiguous

² The spectrum is in the 816-821/861-865 MHz band.

³ In the 811-816/856-860 MHz band, there are 80 paired frequencies within the band allocated for SMR operations.

⁴ As the Commission has tentatively concluded that the reallocation of the Contiguous 800 MHz SMR Channels would be in the public interest, and the apparent lack of opposition to the reallocation, Centennial believes that the proposal will be adopted and takes no position on this proposal.

800 MHz SMR Channels. The incumbent licensees should be permitted to have a continued viability of its authority to operate in the 800 MHz SMR spectrum. Further, licensees which have been granted extended implementation schedules to implement a wide-area system on self-defined footprints should be permitted the granted time to construct such a system and be allowed to compete with the other so-called "ESMR" providers. The ability of current-license holders to operate on the current channels should ensure that the dynamic growth and vigorous competition with the SMR service remain.

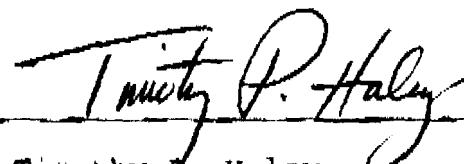
The Commission and others have suggested that mandatory relocation should be imposed on incumbent licensees that do not obtain the MTA-based SMR licenses. However, this measure is anti-competitive and should not be adopted. In the 2 GHz band, the Commission has adopted mandatory relocation requirements for incumbent licensees to permit the implementation of the Personal Communications Service ("PCS"). However, this situation is somewhat different in that (1) the number of incumbent microwave licensees is significantly less than the incumbent 800 MHz licensees; (2) the incumbent microwave licensees provide a fixed service whereas PCS will provide a mobile service, but at 800 MHz, the two services are the same although the technology and capacity may be different; (3) the Commission was able to identify a band of spectrum for relocation which might be able to provide equivalent service for incumbent licensees whereas at 800 MHz, the Commission does not have the ability; (4) a number of the incumbent licensees use their systems for internal purposes and the disruption will not

affect customers that have other alternative service providers to turn to whereas it may be difficult to migrate end users without disruption and possibly severing the goodwill established by the incumbent licensee which is generally not a quantifiable number; and (5) the PCS provider may be able to provide a similar service to the incumbent licensees which use their systems for internal purposes whereas at 800 MHz, this could cause the incumbent licensee to lose its business. Additionally, the relocation of the incumbent licensees will ultimately have to be borne by the consumer. On the other hand, should the incumbent licensees be able to voluntarily remain and operate their business, the consumer may benefit from more competitive rates between the SMR and ESMR providers. Therefore, Centennial believes that mandatory relocation should not be adopted by the Commission.

WHEREFORE, THE PREMISES CONSIDERED, Centennial Telecommunications, Inc. respectfully requests that the Commission take action in conformance with the comments set forth herein.

RESPECTFULLY SUBMITTED,

CENTENNIAL TELECOMMUNICATIONS, INC.

By: 
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